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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

Linda Truesdell,  
Plaintiff,

vs.

Source One Personnel, Inc. /Source One  
Medical Management,  
Defendants,

Civil Action No.

Complaint and Jury Demand  
(Retaliation Under FMLA & NJFLA)

The Plaintiff, Linda Truesdell, by way of complaint against Defendants, Source One Personnel, Inc. /Source One Medical Management, states as follows:

**THE PARTIES**

1. Plaintiff, Linda Truesdell, resides at 68 Mark Twain Drive, Hamilton, New Jersey 08690.

2. Defendants, Source One Personnel, Inc. /Source One Medical Management have offices located at 2 Carnegie Road, Trenton, NJ 08648.

**COUNT ONE  
(WRONGFUL RETALIATION IN VIOLATION OF  
THE FEDERAL FAMILY AND MEDICAL LEAVE ACT)**

3. Plaintiff began employment with the Defendants, Source One Personnel, Inc. /Source One Medical Management, as an Account Manager on February 11, 2003.

4. Plaintiff thereafter continued to perform satisfactorily as an employee of Defendants and was paid a salary, commissions, dental care health and other benefits, receiving promotions and salary increases.

5. On or around March 20, 2007, Plaintiff, who had been promoted to the position of Director of Physician Services, put her supervisor, Ruth Harris, one of the owners of Defendants, on notice that Plaintiff's father had suffered a stroke.

6. Ruth Harris authorized Plaintiff to take emergency medical leave to care for her father, who was subsequently diagnosed with brain cancer.

7. Following Plaintiff's return to New Jersey on Thursday, April 5, 2007, Ruth Harris authorized plaintiff to return to work on the following Monday, April 9, 2007.

8. On Monday morning April 9, 2007, upon her return to work, Ruth Harris informed Plaintiff in the presence of Dawn DeCarlo, Defendants' Director of Human Resources, that the terms and conditions of her employment were changed and that henceforth she was no longer a salaried employee, but rather, would be given work assignments on a per diem basis.

9. Plaintiff requested that her prior compensation and benefits be restored and agreed to perform services as a per diem employee, expressly reserving her rights to pursue her claim under the law.

10. Defendants ignored Plaintiff's complaints about the reduction in her compensation and benefits.

11. Defendants refused and continue to Plaintiff's demands to restore her compensation and benefits.

12. The aforesaid change by Defendants in the terms and conditions of her employment constitute acts of retaliation in violation of the Federal Family And Medical Leave Act, 29 U.S.C.A. 2601, et seq. , as a direct and proximate result of which Plaintiff has suffered economic injury, humiliation, anguish, embarrassment, emotional and mental distress and other damages.

13. The wrongful conduct of Defendants warrants an award of punitive damages.

WHEREFORE, Plaintiff, Linda Truesdell, demands judgment against the Defendants, Source One Personnel, Inc. /Source One Medical Management, for compensatory and punitive damages, together with costs of suit, attorneys' fees and interest, and other such relief as the Court may deem proper.

**COUNT TWO  
(WRONGFUL RETALIATION IN VIOLATION OF  
THE NEW JERSEY FAMILY LEAVE ACT)**

14. Plaintiff, Linda Truesdell, repeats and realleges each and every allegation as set forth in Count One of the Complaint, as though fully set forth herein.

15. The retaliatory conduct towards Plaintiff by Defendants constitutes a violation of the New Jersey Family Leave Act, N.J.S.A. 34:11B-3, as a direct and proximate result of which the Plaintiff has suffered economic injury, humiliation, anguish, embarrassment, emotional and mental distress and other damages.

16. The wrongful conduct of Defendant warrants an award of punitive damages.

WHEREFORE, Plaintiff, Linda Truesdell, demands judgment against the Defendants, Source One Personnel, Inc. /Source One Medical Management, for

compensatory and punitive damages together with costs of suit, attorneys' fees and interest, and other such relief as the Court may deem proper.

**JURY DEMAND**

Plaintiff, Linda Truesdell, demands trial by jury as to all issues.

**CERTIFICATION PURSUANT TO L.CIV.R.11.2**

I certify that the matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding; no other action or arbitration proceeding is contemplated; and I know of no other parties who should be joined in this action at this time.

**Mikulski & Mitchell, LLC**

Attorneys for Plaintiff, Linda Truesdell

By: /s/ Roger S. Mitchell

Roger S. Mitchell, Esq. (RM1711)

Dated: 4-24-07